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BRIAN HOLTZCLAW [redacted]
05/30/2000 04:30 PM

To: MICHAEL MCATEER cc: KEVIN TURNER, Kenneth Bardo, Leo Rosales
Subject: Sauget (IL) Site & Anniston PCB (AL) Site

Mike:

Thanks for our conversation today about this sister PCB manufacturing site in IL.

As promised, I've attached a primer on what our Region 4 response actions have been in Anniston, AL. As we discussed, it was prepared on behalf of the NEJAC Site tour last week. For more information, please contact Karen Knight 256-236-2599 (OSC) or Wes Hardegree (RCRA) 404-562-8486 or Annie Godfrey (RPM) 404-562-8919 or Sherryl Carbonaro (CIC) 256-236-2599.

I am about to share with our Anniston PCB Site Team names & phone nos of your Region 5 folks that are leads working on the Sauget Site in Sauget, IL...as well as a short update. From talking to you, it sounds like only a START contractor has made contact with your folks thus far.

From what we shared, I think it is very important that our staff and managers dialogue on our activities..as well as Solutia's (and other PRPs) response.

Best,
Brian Holtzclaw
EJ Coordinator, 404-562-8684

EPARESPNEJACtour

FACT SHEET

EPA Region 4 Response
to
PCB Contamination in Anniston, Alabama

BACKGROUND

The Anniston polychlorinated biphenyl (PCB) site consists of residential and commercial properties located in Anniston, Calhoun County, Alabama, that are being investigated by the U.S. Environmental Protection Agency (EPA) for contamination.

Previous site investigations by the Alabama Department of Public Health (ADPH), the Alabama Department of Environmental Management (ADEM), the Agency for Toxic Substances and Disease Registry (ATSDR), and EPA Region 4 have determined that the PCB contamination is attributable to the operations at the former Monsanto plant, currently known as Solutia, Incorporated (Solutia). The EPA Superfund Program has an on-going investigation to determine the extent of the PCB contamination throughout the Anniston area.

The Solutia facility in Anniston, Alabama, is one of two facilities in the United States to have produced PCBs (arochlors). The Solutia Anniston plant occupies 70 acres of land, about one mile west of downtown Anniston, Alabama.

The facility is regulated under the Alabama Hazardous Waste Management and Minimization Act (e.g., ADEM has been authorized to implement the Resource Conservation and Recovery Act [RCRA] in lieu of the federal RCRA program). Through investigations initiated under the RCRA program, it has been determined that the Solutia facility, the adjacent community, and the drainage ditches exiting the property as well as the downstream waterways (Snow Creek, Choccolocco Creek, and the Coosa River-Lake Logan Martin) are contaminated with PCBs.

Solutia has conducted investigations of the facility and adjacent communities to determine storm water runoff and air contamination and has instituted interim measures to eliminate further releases and minimize human exposure. The facility is currently investigating the downstream waterways to assess the human health and environmental impacts in these areas. Solutia is facing several lawsuits seeking damages in the several hundred-million-dollar range from citizens in the adjacent community and homeowners along Choccolocco Creek and Lake Logan Martin.

On December 31, 1998, Ms. Carol Browner received a letter from the West Anniston Environmental Justice Task Force, also known as Community Against Pollution (CAP), asking for EPA action in regard to PCB contamination in Anniston, Alabama. Since then, the EPA Region 4 office has been in contact with CAP. One of the main consequences of regional contact with CAP has been the transmittal of information and data that PCB soil contamination exists in areas not directly linked to storm-water runoff from the Solutia facility (considered "remote" soil contamination). CAP also provided information that air releases of PCBs might be occurring at levels of concern at the closed and covered landfills. Information provided by CAP and obtained from Solutia via a RCRA 3007 Order also informed EPA that blood PCB concentrations were elevated in persons living in a broad area surrounding Solutia.

This information provided to EPA was data collected as part of a class action lawsuit against Solutia (e.g., the "Plaintiff's Data" or the "Community Data").

EPA ENVIRONMENTAL JUSTICE & COMMUNITY INVOLVEMENT ACTIVITIES

In March of 1999, the EPA RCRA program contacted a divisional environmental justice (EJ) coordinator (Waste Management Division) for assistance in servicing and responding to two local EJ groups. In addition to CAP, the other community group in Anniston is the Sweet Valley/Cobbtown Environmental Justice (SVC EJ) Task Force. This group was formed about five years ago and was the recipient of a regional EJ grant (1996). This group's main interest is with individuals directly impacted by PCB contamination associated with soils, house dust, air and surface water runoff (runoff was identified in the old conceptual site model, which did not include "remote" soil contamination). The SVC EJ Task Force and CAP have expressed concerns about recent information indicating that "remote" soil contamination now exists and have shared their concerns about potential releases from the closed PCB landfills.

In 1999, the EJ coordinator assisted EPA staff in maintaining regular communications with affected community representatives (such as through teleconference calls and meetings in the field and in EPA offices). The EJ coordinator and EPA RCRA also assisted in facilitating multi-agency involvement (with ATSDR, ADEM, and ADPH) to identify and address the environmental and public health threats. During summer 1999, the two local community groups provided input for a series of off-site environmental sampling events (soil and air) lead by the EPA RCRA program. The EPA RCRA program and the EJ coordinator worked with the boards of the two citizen groups, attorneys, and a limited number of public participants to organize a public meeting (September,1999). Subsequently, a larger public meeting (with multiple agencies) was held with over 400 citizens in attendance (December, 1999). At this meeting, the agencies opened official dialogue among all governmental entities and the community. They explained roles and responsibilities, explained recent EPA sampling results, and outlined general government plans for assessing current and future health threats.

In late 1999, the CAP became the recipient of a regional EJ grant. This has allowed the CAP to maintain a local office for receipt and dissemination of information to the community. During that time frame, the ATSDR, EJ coordinator, and RCRA program worked with CAP to collaboratively design a community health survey. The CAP, in concert with these agencies, sponsored a special training session on conducting health surveys for approximately 50 students from nearby Talledega College and Jacksonville State University. A special funding by ATSDR ($10,000) assisted in the collection of data for about 500 health surveys.

Also in 1999, EPA asked ATSDR to perform a Health Consultation on the Plaintiff's soil, blood, and air data (Community Data). The ATSDR draft Health Consultation was released via a public notice and meeting in February 2000. In this draft, ATSDR recommended further soil and air investigations. The regulatory programs are currently proceeding with actions to address these ATSDR recommendations. An exposure investigation focusing on children was conducted in March 2000 and results will be forthcoming.

The opening of the Community Relations Center (CRC) in downtown Anniston (January 2000), has enhanced community involvement activities. During February - May 2000, the two local community groups have provided input to planning for a series of off-site environmental sampling events (soil and air) performed by the EPA Superfund Program. Community information (based upon their knowledge of historic practices, potential contamination routes and previous studies) was provided to EPA and ATSDR

for environmental sampling (off-site) and health-related activities. During that time frame, CAP members have worked extensively with EPA to assist in site access agreement activities for hundreds of residents.

The EPA community involvement coordinator and the on-scene coordinator (OSC) have participated with CAP during several news media events and special call-in talk shows. Formal and informal meetings/calls are held with CAP and SVC EJ Task Force on a regular basis to discuss current issues for next phases of investigations (e.g. environmental assessment and health sampling for Exposure Investigation).

EPA REGION 4 RESPONSE

The new information on the existence of "remote" soil contamination and possible air releases has resulted in revisions and rethinking of the conceptual model of PCB migration and contamination in Anniston. Prior to December 31, 1998, storm water runoff in ditches and creeks was the main release pathway being investigated and addressed at Solutia. With the discovery of PCB contamination beyond the drainage pathways, other migration pathways and source(s) of contamination and exposure are being investigated. Currently, the regulatory response to the PCB contamination in Anniston is divided between RCRA (ADEM) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

- **EPA RCRA Program Activities**. Releases of PCBs and other hazardous constituents and wastes from solid waste management units at the Solutia facility are regulated by RCRA and its amendments. As explained earlier, all work performed by Solutia under RCRA is administered by ADEM under the Alabama Hazardous Waste Management and Minimization Act. The EPA RCRA program actively reviews all work performed by Solutia under this program and provides technical and administrative assistance to ADEM. In general, RCRA is dealing with releases at the manufacturing facility and confirmed releases from the facility (such as groundwater monitoring and cap inspection and maintenance of on-site landfills, control of PCB-contaminated surface water runoff from Solutia, and investigation and remediation of PCB-contaminated ditch, creek, and river sediment).

- **EPA Superfund Program Removal Assessment Activities**. The EPA Region 4 Emergency Response and Removal Branch (ERRB) is performing a removal assessment of the "remote" soil contamination at the Anniston site. In January 2000, EPA ERRB assigned an OSC and community relations specialist to Anniston. In addition, the EPA Region 4 Science and Ecosystem Support Division (SESD) and an EPA site assessment contractor were tasked by the OSC to conduct residential and commercial soil sampling. A summary of the soil sampling follows:

  - In February 2000, PCB field soil screening was conducted at 75 residential properties and PCB, dioxin, and other environmental samples were collected for fixed laboratory analyses at 69 residential properties.

  - In March 2000, soil samples from 22 commercial facilities (including foundries located throughout Anniston) were collected by EPA and ADEM's CERCLA

program for PCBs and metal field screening. In addition, EPA collected water, sediment, and waste samples from landfills, ditches, outfalls, drainage areas, and springs for PCB analyses and collected PCB field soil samples from 10 residential properties. Fifteen percent of the field screened samples were also sent to a fixed laboratory for confirmation of results.

- In April and May 2000, PCB field soil screening was conducted at 257 residential properties, 1 school and 1 commercial facility. PCB and metal samples were collected for fixed laboratory analyses at 80 residential properties. In addition, waste samples (consisting of foundry slag, sediment, and a black, tar-like material) were collected and submitted for laboratory analysis. Fifteen percent of the field screened samples were also sent to a fixed laboratory for confirmation of results.

- On May 10, 2000, a meeting of subject matter experts on sampling and analysis was held in Anniston with representatives from EPA, ADEM, ADPH, EPA SESD, and START. The meeting focused on Phase I residential activities, sampling techniques, field observations, and future plans.

As part of the removal assessment, EPA also opened a Community Relations Center (CRC) located in downtown Anniston in January 2000. The CRC is an information center, distributing brochures and fact sheets, answering approximately 1,525 calls, and providing services to 541 people visiting the center as of April 28, 2000. EPA regional staff is also working very closely with two major community groups, CAP and SVC EJ Task Force, to ensure effective community involvement in EPA's activities at the site. Numerous newspaper and TV stories were coordinated with the CRC.

- **EPA Superfund Program Remedial Assessment Activities.** The EPA remedial program is gathering data to assess the need for, and the appropriateness of, proposing the Anniston PCB Site on the National Priorities List (NPL). The EPA removal program has collected soil samples as part of their removal assessment. The analytical data from these samples will be used for an NPL ranking package. Air sampling for the NPL ranking package will be conducted this summer. The remedial program has coordinated closely with the removal program and RCRA to ensure that unacceptable risks are addressed and that efforts are not duplicated. In addition to the Anniston PCB Site, 23 other sites in the Anniston area are currently undergoing evaluation as potential Superfund sites. This work is being conducted by ADEM under a cooperative agreement with the EPA remedial program.

FUTURE ACTIONS

- **Air Sampling Activities (EPA RCRA and EPA Superfund).** Further investigations of ambient air are to be conducted jointly by the EPA/ADEM RCRA program and the EPA Superfund program. With oversight provided by EPA, ADEM RCRA will require Solutia to monitor and investigate on-site air releases (such as an investigation of PCB releases to the air from on-site landfills) and areas of soil and sediment contamination within the defined drainage areas, while the EPA Superfund will assess releases of PCBs to the air within the community. These two air monitoring investigations will be coordinated between programs, and planning is currently underway.

- **EPA Superfund Soil Sampling**. The next residential sampling event is scheduled for late July 2000. At this time, an additional 80 residents will have samples collected and analyzed by EPA SESD, and over 200 residents will have their properties field screened by EPA contractors.